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From: Koch, Kristine
Sent: Friday, March 06, 2015 2:53 PM
To: Bob Wyatt (rjw@nwnatural.com); Jim McKenna (jim.mckenna@verdantllc.com)
Subject: Dioxin/Furan Follow-up
Attachments: D-F-Congeners-COCs-Benthic-Comparison-AllAlts.pdf; PeCDF_Top3SDUs_2015-02-27_1428.pdf

Jim & Bob – Here is the PeCDD RAL curve developed by CDM Smith for EPA and a map of the areas exceeding the RALS for PeCDD, PeCDF, and TCDD. As we discussed on Tuesday, our concerns with the evaluation are twofold: 1) The PRG for the dioxins are generally lower than the DL, thus the RAL/SWAC approach will map the entire site if site data are at the DL (or even a ND at the DL). We looked at the 95%ile of the ND values from the background data set, but the detection limits for the site may be greater due to interference with other contaminants. We are looking further into this issue. 2) Except in some areas of focus, the dioxin data are sparse. This lessens the reliability of the RAL/SWAC approach because RAL/remediation areas will be interpolated across large areas without data, creating a greater likelihood that results are a “false positive”. Thus, the development of a range of RALs for this COC and resultant acres for remediation are limited by the data density. This will be figured out in RD, but we need to come up with a way to reasonably estimate this in the FS. We are still exploring this issue, too.

The low data density combined with the issues associated with mapping areas at the DL necessitate an alternate approach. The approach we are exploring is to define an area of greatest impact from the PeCDD and include that footprint in alternatives B through F. This approach is similar to the benthic toxicity approach and addresses the need to remediate highly contaminated areas while circumventing the misleading outcomes associated with using the RAL/SWAC approach for these COCs. However, we are considering the option of using the RALs for Alternatives B through D and then retaining the D RAL footprint as a static option for Alternatives E, F and G as suggested by Carl. In addition, we are still considering the need for RALs of 3 congeners vs. 2 congeners (a dioxin and a furan) as suggested by Carl in the meeting on Tuesday. We will convey to you early next week how we plan to proceed. We have already established a conference call for next Thursday to discuss how EPA plans to proceed.

Have a nice weekend,

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